

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

FELITA FOWLER,	)	
	)	CIVIL ACTION NO: <u>2:23-cv-00123</u>
Plaintiff,	)	
	)	
-vs-	)	COMPLAINT
	)	(JURY TRIAL REQUESTED)
SUMMIT ENGINEERING	)	
LABORATORY & TESTING, INC.,	)	
	)	
Defendant.	)	
_____	)	

Plaintiff alleges:

1. Plaintiff is a citizen and resident of Dorchester County, South Carolina. Defendant is a corporation organized under the laws of the State of South Carolina, with its principal place of business located in Raleigh, North Carolina.

2. At all times herein mentioned Justin N. Brown (Brown) was an employee of Summit Engineering, Laboratory & Testing, Inc., acting within the scope and duty of his employment.

3. On October 12, 2020, at approximately 5:49 P.M., Plaintiff was operating her vehicle in an northerly direction on U.S. 17A in Berkeley County South Carolina, and was stopped in traffic. A vehicle owned by Defendant and being operated by Brown, traveling in the same direction, , failed to stop and slammed into a vehicle being operated by Ellen M. Klume, causing her vehicle

to collide with a vehicle operated by Cynthia Pringle-Grant, causing her vehicle to collide with Plaintiff's vehicle.

4. Defendant was negligent and reckless in one or more of the following ways:

- a) Traveling too fast for the conditions;
- b) Failing to keep his vehicle under proper control;
- c) Failing to execute proper maneuvers to avoid a collision;
- d) Failing to keep a proper lookout;
- e) Failing to timely apply his brakes;
- f) Following too closely; and
- g) Failing to exercise the degree of care that a reasonable and prudent person would have under the same or similar circumstances.

5. As a direct result of Defendant's negligence and recklessness, Plaintiff sustained the following damages:

- a) Medical bills, including hospital, physician, and prescription charges;
- b) Physical and mental pain and suffering; and
- c) Loss of enjoyment of life.

WHEREFORE, Plaintiff demands judgment against Defendant for such amounts of actual and punitive damages as the trier of facts shall determine, for the costs of this action, and for such further relief as the Court

deems proper.

/s/ Johnny F. Driggers  
JOHNNY F. DRIGGERS, ESQUIRE  
108 Central Avenue, Suite 7  
Post Office Box 757  
Goose Creek, SC 29445  
(843) 572-8222  
FEDERAL I.D. #606  
ATTORNEY FOR PLAINTIFF

Goose Creek, South Carolina

January 10, 2023.